

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA

In Re: Georgia Thomas,  
Debtor.

Chapter: 13  
Case Number: 16-32655

MOTION TO LIFT CO-DEBTOR STAY

COMES NOW Republic Finance, LLC., a Creditor in the above case, and moves the Court to enter an Order lifting the co-Debtor Stay as it applies to Willie Thomas, and states as grounds that Willie Thomas and the Debtor co-signed a contract in favor of Republic Finance, LLC., and the Debtor has not elected to protect the co-Debtor and pay the debt in full in the above Chapter 13 case. Therefore, to the extent the debt is not being paid in full by the Debtor, the Creditor requests that the co-Debtor Stay be lifted so the Creditor can collect the debt from Willie Thomas, the co-Debtor.

/s/ Richard C. Dean, Jr.  
Attorney for Republic Finance, LLC.

OF COUNSEL:  
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BGA

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing upon the following interested parties electronically (CM/ECF) or by placing a copy of the same in the United States mail, postage prepaid and properly addressed on the date that this document is filed in the above case:

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/s/ Richard C. Dean, Jr.  
Of Counsel